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**DISTRICT COURT OF ARIZONA**  
**UNITED STATES DISTRICT COURT**

CV-22-1967-PHX-DMF

**STACI BURK**, a single woman,

Plaintiff

vs.

**KELLY TOWNSEND, RYAN  
HARTWIG, MICHEAL FLYNN,  
SIDNEY POWELL, DOUG LOGAN,  
TOWN OF FLORENCE, DOES I-X.**

**SECOND AMENDED COMPLAINT**

VIOLATION OF 42 U.S.C. 1983  
FOURTEENTH AMENDMENT  
FIRST AMENDMENT  
FOURTH AMENDMENT

FALSE IMPRISONMENT

ASSAULT

INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS

NEGLIGENT INFLICTION OF  
EMOTIONAL DISTRESS

CIVIL CONSPIRACY

Plaintiff, Staci Burk, hereby respectfully brings forth this Amended Complaint  
against Defendant Kelly Townsend, and DOES I-X, known and unknown at this filing.

### **JURISDICTION AND VENUE**

1. At all times relevant, Plaintiff Burk was a resident of Arizona.
2. This court has venue under 28 U. S. C. 1390 as the events giving rise to this complaint primarily occurred in the state of Arizona under the geographical jurisdiction of this court.
3. This court has subject matter jurisdiction over this cause of action pursuant to 28 U.S.C. § 1331, because the case involves a federal question and complaint arising out of 42 U.S.C. §1983.
4. Pursuant to U.S.C. 1367, this court has supplemental jurisdiction over the state court claims, as these claims arise out of the same transaction or occurrence and share a common nucleus of operative fact.
5. Defendant Kelly Townsend was at the time of these events and remains a resident of Arizona subject to the jurisdiction of this Court.
6. Defendant Ryan Hartwig was at the time of these events and remains a resident of Arizona subject to the jurisdiction of this Court.
7. Defendant General Micheal Flynn was at the time of these events an out of state resident however was physically present in, and engaged in conduct that gives rise to this complaint while either in Arizona or having substantial minimal contacts with Arizona residents, including other Defendants.
8. Defendant Sidney Powell was at the time of these events an out of state resident however was physically present in, and engaged in conduct that gives rise to this complaint while either in Arizona or having substantial minimal contacts with Arizona residents, including other Defendants.

- 1 9. Defendant Town of Florence is a municipality within the State of Arizona, charged with  
2 the oversight and supervision of peace officers within its jurisdiction. The Town of  
3 Florence through its agents and the doctrine of respondeat superior engaged in conduct  
4 that gives rise to this complaint.

5 **PARTIES**

- 6  
7  
8 10. At all times relevant to this Complaint, Plaintiff Staci Burk is a citizen of the United  
9 States and a resident of Arizona. Burk is a mother of four adult children and three  
10 grandchildren. At all times relevant to this Complaint, Burk had clearly established legal  
11 rights under state and federal law and the United States Constitution. Burk submits  
12 herself to the jurisdiction and venue of this Court and is entitled to bring this action under  
13 both state and federal law for all general, special, and any other permissible damages.

- 14 11. At all times relevant to this Complaint, Defendant Kelly Townsend is a United States  
15 citizen, an Arizona resident, and a former Member of the Arizona Legislature. At all  
16 relevant times to this Complaint, Townsend was acting under the color of state law and  
17 federal laws. At all relevant times, Townsend was subject to the laws of the State of  
18 Arizona and the Constitution of the United States. At all relevant times, Townsend was  
19 responsible for knowing and acting in accordance with all laws, policies, procedures,  
20 orders, special orders, general orders, guidelines, and regulations of the Arizona  
21 Legislature, while upholding her responsibility as a Member of the Arizona Legislature to  
22 act in accordance.

- 23 12. At all times relevant to this Complaint, Defendant Sidney Powell is a United States  
24 citizen, a Florida resident, and a former Federal Prosecutor and Author. At all relevant  
25 times to this Complaint, Powell was acting under the color of state law in conjunction  
26 with a state actor and federal laws. At all relevant times, Powell was subject to the laws  
27 of the State of Arizona and the Constitution of the United States where she had minimal  
28 contacts as she was physically present in Arizona engaging in post-2020 election  
advocacy and efforts.

13. At all times relevant to this Complaint, Defendant Mike Flynn is a United States citizen,  
a Florida resident, Three Star General, former Head of Defense Intelligence Agency, and  
served as National Security Advisor for Former President Trump. At all relevant times to

1 this Complaint, Flynn was acting under the color of state law in conjunction with a state  
2 actor and federal laws. At all relevant times, Flynn was subject to the laws of the State of  
3 Arizona and the Constitution of the United States where she had minimal contacts as she  
4 was physically present in Arizona engaging in post-2020 election advocacy and efforts.

5 14. At all times relevant to this Complaint, Defendant Doug Logan is a United States citizen,  
6 a Florida resident, former CEO Cyber Ninjas. At all relevant times to this Complaint,  
7 Shattuck was acting under the color of state law in conjunction with a state actor and  
8 federal laws. At all relevant times, Shattuck was subject to the laws of the State of  
9 Arizona and the Constitution of the United States where she had minimal contacts as he  
10 was physically present in Arizona engaging in a post-2020 election audit effort.

11 15. At all times relevant to this Complaint, Town of Florence is a municipality in Arizona,  
12 approximately one hour southeast of metropolitan Phoenix. At all relevant times to this  
13 Complaint, the Town of Florence and its officers were acting under the color of state law  
14 and federal laws, with its police officer agents acting under respondent superior. At all  
15 relevant times, Town of Florence was subject to the laws of the State of Arizona and the  
16 Constitution of the United States and having established a special relationship with  
17 Plaintiff after responding to a 911 call, left Plaintiff in a dangerous and unsafe situation  
18 upon departure.

## 19 HISTORY AND BACKGROUND

20 16. Defendant Townsend apparently has a long history of mobilizing and weaponizing  
21 various anti-government groups to accomplish her political objectives, including but not  
22 limited to abuse of power and using her power to conduct targeted investigations outside  
23 the scope of her authority as a legislator.

24 17. In 2010, Defendant Townsend led the Arizona Tea Party, and while running for House,  
25 spoke at a Surprise Tea Party event with an election attorney who presented election  
26 theories that voting machines were “rigged,” invoking Hugo Chavez and Venezuela.<sup>1</sup>

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27 <sup>1</sup>[https://web.archive.org/web/20101022051159/http://www.sonorannews.com/archives/2010/101013/frontpage\\_Obama.html](https://web.archive.org/web/20101022051159/http://www.sonorannews.com/archives/2010/101013/frontpage_Obama.html)



- 1 18. In 2020, a decade later, Defendants Kelly Townsend and Defendant Sidney Powell made  
2 nearly identical claims as those presented at the 2010 Tea Party meeting about rigged  
3 voting machines.
- 4 19. In the immediate post-election period both Defendants Townsend and Powell claimed to  
5 Plaintiff they had evidence and proof of vote rigging which Plaintiff came to believe, and  
6 then disavow, as events unfolded.
- 7 20. Plaintiff was elected to the school board in 2010 and was appointed Board President in  
8 2013. Defendant Townsend was also elected to the Arizona House in 2010 and attended  
9 Plaintiff's board meetings as an outspoken parent, along with the also very outspoken Tea  
10 Party Patriot group Townsend led at the time in Plaintiff's District.
- 11 21. As the Tea Party group attended meetings, a counter-protest group also began attending  
12 school board meetings and the environment became very divisive over time. Plaintiff was  
13 a swing vote on the all-Republican school board. If she voted one way was considered a  
14 traitorous cabal leader out to destroy public education, while if she voted the other was a  
15 traitorous RINO, out to usher in a communist, Marxist, global agenda. Finding little to no  
16 solutions or common ground and with deteriorating health, Plaintiff left the Board and  
17 decided not to run again in 2016.
- 18 22. After leaving the school board, Plaintiff was assessed and determined by State of  
19 Arizona, that due to her physical condition and disability, she is a qualified vulnerable  
20 adult who meets criteria for protection under A.R.S.13-3623(F)(6). Plaintiff was deemed  
21 a vulnerable adult prior to these incidents in 2020 and her status as a vulnerable adult is  
22 ongoing. Defendant Townsend is aware of Plaintiff's health and vulnerability.
- 23 23. Defendant Townsend continued in the Arizona House and throughout 2020 both led and  
24 amplified QAnon adjacent groups formed in opposition to child welfare agencies, mask  
25 use, anti- vaccine, opposing lockdown orders, school curriculum, election integrity, and  
26 claims by Defendant that the Democrat child sex trafficking goes "all the way to the top."
- 27 24. In 2011, before former President Donald Trump ran for office, Defendant Townsend met  
28 with Trump privately in his office soliciting his help to investigate conspiracy theories  
that Obama was an "illegitimate" President. Townsend invited Trump to Arizona to meet  
the Tea Party alleging he would find a friendly audience with the group.<sup>2</sup>
- 25 25. On July 5, 2017, while serving as House Elections co-chair, Defendant Townsend posted  
to her social media, ***"I would like to see Arizona turn over our voter information. I am***
-

1 *not saying the Feds should take over our elections but an audit is in order.*  
 2 *#transparency.”<sup>3</sup>*

3 26. In October 2019, as Defendant Townsend worked with Shelby Busch, she and another  
 4 Senate colleague investigated claims that children were being sex trafficked through the  
 5 child welfare system (“DCS”) to globalist elite Democrats. Townsend led the various  
 6 QAnon and militia adjacent anti-DCS groups and was tagged during this period in social  
 media posts with QAnon author Dave Hayes, Shelby Busch, and Defendant General  
 Flynn associated journalist Ann VanDersteel.

7 27. In April 2019, Defendant Townsend spoke in opposition to Department of Child Safety  
 8 and was removed from a courtroom by Judge Ryan for violating court rules on  
 9 confidentiality speaking publicly about the hearings. Defendant Townsend demanded  
 Judge Ryan put in writing why he was removing a sitting legislator from his courtroom.<sup>4</sup>

10 28. On April 25, 2019, Defendant posted a selfie video highlighting sex trafficking as an  
 11 issue while undermining public confidence in elections stating, *I’m State Representative*  
 12 *Kelly Townsend and chair of the elections committee. Would you believe me if I told*  
 13 *you that the people who are coming in as asylum seekers and illegal immigrants would*  
*be able to vote in the 2020 election?*

14 29. On September 29, 2019, Defendant Townsend posted another selfie video alleging  
 15 without evidence, that she believed immigrant voters registered under the Arizona  
 16 “federal only” system could be illegal voters.<sup>5</sup> In the video she tells constituents she was  
 17 going to the White House to talk about potential voter fraud because she believed there  
 18 were more than enough voters registered under “federal only,” that if they committed  
 perjury on the registration form, those fraudulent votes could, *“easily overturn or change*  
*the direction of an election and that was before we were rushed at the border.”*

19 30. The following day Townsend posted, “Hey guys, so my meeting is done, and *I met with*  
 20 *some folks here at the White House. I want to let you know that they took some good*  
 21 *notes and are going to do some homework. I shared some ideas from other states as*  
 22 *well...And so now we have the White House on board to look into this and see what*  
 23 *else we can do and get done quickly before the 2020 elections.* So, I'm just trying to do  
 my best to get all this thing here. It's beyond, and it's just unbelievable what we have

24 <sup>3</sup> On July 5, 2021, while the Arizona audit was in progress, Defendant Townsend reshared her 2017 post with the  
 25 statement, “Calling for an audit since 2017.”

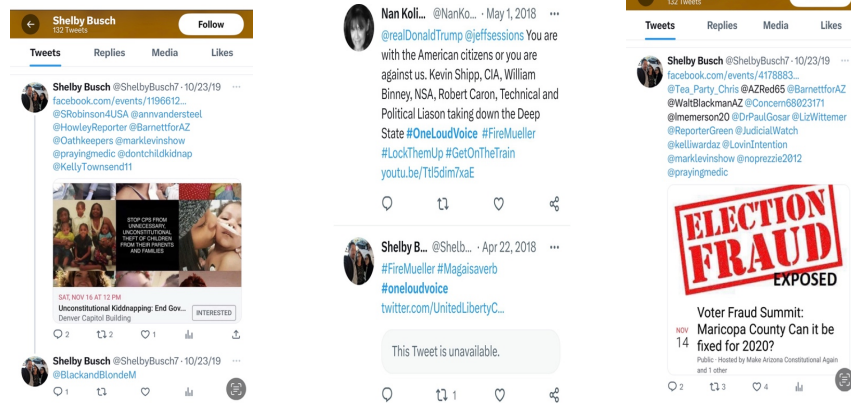
26 <sup>4</sup> [https://www.azcentral.com/story/news/local/arizona-child-welfare/2019/04/11/judge-boots-media-lawmaker-kelly-](https://www.azcentral.com/story/news/local/arizona-child-welfare/2019/04/11/judge-boots-media-lawmaker-kelly-townsend-dcs-case-chandler-parents-feverish-toddler/3430297002/)  
 27 [townsend-dcs-case-chandler-parents-feverish-toddler/3430297002/](https://www.azcentral.com/story/news/local/arizona-child-welfare/2019/04/11/judge-boots-media-lawmaker-kelly-townsend-dcs-case-chandler-parents-feverish-toddler/3430297002/)

28 Judge Ryan reportedly told Defendant he would put it in the record. Defendant worked behalf of a group of parents  
 aggrieved by DCS, assuring the parents that she was working to take down the child sex trafficking cabal within  
 DCS which she claimed went “all the way to the top.”

<sup>5</sup> Federal only voter registration is a system in which voters are not required to provide proof of citizenship to  
 register, but are only allowed to vote in Federal races.

allowed. We can't have it anymore. *We have way too many people who could potentially change our elections who would be voting in our elections illegally. So, let's get this thing done. Thank you, guys, for your support, and let's see what happens.*

31. Defendant Townsend continued to lead and organize school board protests, rallies, and events, such as Bikers for Trump, Latinos for Trump, MAGA Drag the Interstate 1776, and other groups in opposition to vaccines, mask mandates, lockdown orders, election integrity, and conspiracies regarding the existence of a globalist cabal secretly working to usher in New World Order that is also involved in child sex trafficking.
32. Starting in 2018, Defendant Townsend participated in a movement with Shelby Busch and Josh Barnett organizing under the the hashtag #1loudvoice or #oneloudvoice with the Oathkeepers, investigating "vigilante style," alleged child sex trafficking allegations on the border. Defendant Townsend visited a camp in which children were supposedly held and legitimized claims of child sex trafficking in the camp. Authorities investigated and found no evidence of such claims.



33. Also starting in 2018, the group apparently organized around the hashtag #1loudvoice and #oneloudvoice brought several groups Townsend regularly spoke at these groups throughout 2020 who came together to form a powerful coalition. According to its now archived website, the #1loudvoice coalition also *included the group that provided security for Defendant Flynn and Powell, First Amendment Praetorians, a private security group made up of former FBI, CIA, NSA, law enforcement, intelligence, and military officers which began on September 23, 2020, and is allegedly a government contractor under Sheppard Group, to provide security and investigation services.*<sup>6</sup>

<sup>6</sup> <https://web.archive.org/web/20210621070227/https://www.1loudvoice.org/collation-members>

Entity Information		NAICS Code	Registration	Disaster Response Registry
SAM ID	U2BHRWBYR2MH1 <i>Unique Entity ID by SAM</i>	561320 - Temporary Help Services 561611 - Investigation Services 561612 - Security Guards and Patrol Services 561990 - All Other Support Services 611699 - All Other Miscellaneous Schools and Instruction North American Industry Classification System (NAICS)	Date: November 25, 2020 Expiration Date: April 19, 2022 Update Date: April 19, 2022 Activation Date: April 22, 2021	Any area - D&B Entity Validation Service
CAGE Code	8UJE4 <i>Commercial and Government Entity (CAGE) Code by NATO Codification System</i>	PSC Code	Business Start Date: September 23, 2020 Fiscal Year End Date: 1231 Record Status: Expired Registration Purpose: Z2 - All Awards Credit Card Usage: N Debt Subject to Offset: N Disaster Response Registry: Any area - EVS Source: D&B Entity Validation Service	Points of Contacts (POC)
Legal Name	1ST AMENDMENT PRAETORIAN LLC			Electronic Business POC
DBA Name	SHEPHERD GROUP THE			Title: CEO Officer Name: ROBERT P LEWIS
Company Division	1ST AMENDMENT PRAETORIAN			Address: 22287 Mulholland Highway Pmb 379 Calabasas CA 91302
Division Number	1ST AMENDMENT			Government Business POC
Physical Address	26565 Agoura Rd Ste 200 Oic 24 Calabasas CA 91302-1990			Title: DIRECTOR OF BUSINESS DEVELOPMENT Officer Name: PHILLIP LUELSDOFF
Mailing Address	22287 Mulholland Highway Pmb 379 Calabasas CA 91302			Address: 1600 Wisconsin Ave Nw Unit B Washington, Dc DC 20007
Congressional District	33			
Corporate URL	https://1APraetorian.com			
Entity Structure	2L - Corporate Entity (Not Tax Exempt) -			

34. Defendant Townsend also has a long history of association with anti-government militia groups, including participating in a standoff with Federal agents at Bundy Ranch in 2014, with Oathkeeper leader Stewart Rhodes.<sup>7</sup>

35. In 2014, according to reports, at the Bundy Ranch standoff, the Arizona State Militia/Praetorian Guard led an armed standoff against the Federal government. In 2020 records, Defendant Townsend remains an active member of the organized Arizona State Militia/Praetorian Guard. In 2022, Defendant told Plaintiff she was proposing legislation to formalize an Arizona State militia.<sup>8</sup>

36. In February 2020, Defendant Townsend sponsored a bill to establish a voter fraud hotline and expand law enforcement power for the voter integrity unit agents to enter any polling place or vote count center while votes are being counted to investigate a criminal complaint. ***Defendant Townsend's stated purpose of the proposed bill was because, without evidence, she anticipated foreign interference in the 2020 election*** and her proposal would help the election integrity unit investigate should that occur. Though her bill did not pass, after the 2020 election, Defendant Shattuck published a voter fraud hotline to receive complaints.

37. In March 2020, Plaintiff received an urgent and alarming call from Townsend stating she had just got off a national conference call with other legislators from across the Country, Townsend said she could not share details, but things were "about to get really bad," and there will be lockdowns and travel restrictions.

<sup>7</sup> Stewart Rhodes was convicted last year of seditious conspiracy.

<sup>8</sup> <https://thenevadaindependent.com/article/metro-comes-federal-officers-bundy-ranch-standoff>  
<https://www.exposedbycmd.org/2022/08/05/here-are-five-of-alecs-most-far-right-members/>

1 38. On that call in March 2020, Townsend advised Plaintiff to buy bulk ammo and stock up  
2 on food alleging foreign adversaries had infiltrated the government and were working to  
3 take down the Country. She said there was mass illegal surveillance and an information  
4 war in which foreign entities were subverting the Country. She said the call was  
5 confidential, but it was very serious.

6 39. A week or two later, chaos ensued as lockdowns were ordered in response to the Covid-  
7 19 pandemic which seemed to reinforce Townsend's warnings and credibility as far as  
8 having inside knowledge of internal government action and unusual actions.

9 40. Plaintiff later learned Townsend was part of organized election integrity conference calls  
10 with Defendant Flynn, Defendant Powell, and other State legislators across the Country,  
11 and participants on those conference calls advanced similar claims during this period.

12 41. In April 2020, Defendant Townsend invited Plaintiff to an anti-lockdown rally at the  
13 Arizona Capitol where Townsend spoke before a crowd of a few hundred people.  
14 Plaintiff drove to the event but being medically high risk for COVID and on oxygen, did  
15 not get out of her car. Several crowd members held "Q" or "Q sent me," signs as drones  
16 flew around but Plaintiff did not understand what they meant.

17 42. Other than this event and accompanying Townsend at her request on a ride to Tucson in  
18 2014 to drop off flyers for a LeVoy Finicum protest, Plaintiff has never attended political  
19 rallies or protests of any kind.

20 43. On June 25, 2020, Project Veritas featured a profile article of Defendant Hartwig alleging  
21 *"Another Facebook whistleblower: Interference on a global level in elections."* The  
22 article featured Defendant Hartwig and Project Veritas James O'Keeffe discussing the  
23 censorship of conservatives on Facebook.<sup>9</sup>

24 44. During the summer 2020, on at least three separate occasions Townsend repeatedly urged  
25 and pressured Plaintiff to watch an 8-hour-long video "on Venezuela." Plaintiff said she  
26 was busy with family and other obligations and asked for the short version.

27 45. Defendant Townsend described the video content as how the elitist globalist cabal uses  
28 certain tactics to overtake countries such as what was done in Venezuela. Townsend  
repeatedly urged Plaintiff to watch the entire video series claiming it was "very serious."  
Although Plaintiff did not watch the video, she later learned the video is considered a  
QAnon recruitment tool.

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<sup>9</sup> <https://www.projectveritas.com/news/another-facebook-whistleblower-interference-on-a-global-level-in-elections/>

1 46. In July 2020, Townsend posted a video profiling a flaming “Q,” and the 47-minute-long  
 2 video claims the “virus is real but the pandemic is fake” and that “they” are working to  
 3 use the virus to “establish a new world order,” with Defendant adding her own statement,  
 4 “This very well may be the answer to our question as to why.” On social media,  
 5 Townsend follows and is endorsed by nearly all top QAnon community members.

6 47. On August 26, 2020, Townsend posted a video publicly about Kenosha, WI, encouraging  
 7 her followers to *organize against those seeking to destroy the Country, “being part of a*  
 8 *group, getting separated from the group, I would love to see better coordination people*  
 9 *are going to want to be involved.* So, if that's you, and if you feel that you're going to be  
 10 one of the people that is going to show up to defend your town, I hope that you have  
 11 already reached out to your local law enforcement to your Sheriff's Office. *Pinal County*  
 12 *Sheriff [Mark Lamb] has reached out and offered a Posse program you know and*  
 13 *they're trying to get that off the ground. Those are the kinds of things. We need the*  
 14 *coordination, the communication, so that if it does happen, we're not trying to*  
 15 *coordinate in the moment, because we will see chaos we will see loss of life... I get the*  
 16 *sense now that no longer are Americans going to sit by and watch towns burn to the*  
 17 *ground and they're going to involve themselves. So let's coordinate in that and make it*  
 18 *official.”*<sup>10</sup>

19 48. In the comments Defendant posted, *“I meant to finish my point that a community has*  
 20 *many parts and the citizen militia and those who want to defend their town/property*  
 21 *are one of the many parts needed to do so. If we work together, then we are far more*  
 22 *effective.”*

23 49. Leading up to the 2020 election, Townsend and fellow legislator Mark Finchem were part  
 24 of an online group called “The Rise.” According to witnesses, throughout 2020  
 25 Townsend spoke in person at protests and rallies posted in the group, some of which  
 26 identified Townsend and Finchem as speakers. Former Arizona Oathkeeper leader Ray  
 27 Epps testified to the January 6<sup>th</sup> committee that prior to going to the Capitol on January  
 28 6<sup>th</sup>, he was a member of “The Rise” and this prompted him to go to D.C. According to  
 witnesses, Epps also participated with Townsend and Liz Harris in Black Lives Matter  
 counterprotest groups as part of “Back the Blue.”

50. Plaintiff was not aware of what was happening at these protests and events because  
 homebound with her disability, she did not attend.

51. On August 1, 2020, two months after the Project Veritas profile of Defendant Hartwig  
 highlighting Facebook his piece on censorship as *“interference on a global level of*  
*elections,”* Hartwig was endorsed by Brazilian President Eduardo Bolsonaro. In 2022, a

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<sup>10</sup> Around this time Defendant coordinated a group that included several members of various groups and militias  
 called “Pinko Posse.”



mass protest like January 6, 2021, in the U.S., also occurred in Brazil following Bolsonaro's election loss.



52. On August 31, 2020, Hartwig highlighted attacks on candidate Liz Harris who was running in the then-upcoming 2020 election. Hartwig claimed censorship was election interference.



53. October 16-18, 2020, a Patriot Party Rocks event held in Scottsdale, Arizona hosted by Felisa Blazek which Defendant Flynn's sister, Barbara Redgate, QAnon Shaman Jake Chansley, and others from the #1loudvoice group which Defendant Townsend spoke at and attended groups with their consortium throughout 2020. An event on December 12, 2020 held across the U.S. and in Washington D.C. called the Jericho March was also part of this group per the website.<sup>11</sup>

54.

<sup>11</sup> <https://www.thepatriotparty.rocks/about-us>

## ALLEGATIONS

55. On or around November 3<sup>rd</sup>, Defendant Townsend contacted Plaintiff urging that if she or anyone she knew had any voting-related issues, file a complaint with the AAG's Office Election Integrity Unit. Shortly after, Plaintiff filed a complaint with the EIU regarding the inappropriate cancellation of her voter registration asking that the unit contact her but did not get a return call. At this time, Townsend was sharing widely the EIC was not doing enough to investigate election fraud claims.

56. On November 4, 2020, the day following the election at a Stop the Steal rally outside the Capitol, ***Defendant Townsend, while representing herself as Arizona House Elections Committee Chair, alleged the legislature had plenary power and authority to decide electors and investigate election fraud claims eliciting the help of a large crowd consisting of militia group members and QAnon adherents, to go out and collect affidavits and evidence "vigilante style" to find proof of voting issues and contact GOP chairwoman Kelly Ward.***<sup>12</sup>

57. Defendant Townsend's security throughout 2020 as she spoke at rallies and events, Three Percenter leader Marko Trickovic and Steve Daniels, along with others from the rally, including Liz Harris, mobilized to a polling location and recorded a video of a woman claiming she was forced to use Sharpies which invalidated her and other's ballots. Townsend immediately followed up with a social media post asking voters to come forward with information on the "forced use of Sharpies."

58. During a public rally in mid-December 2020, Townsend alleged that on November 5, 2020, she approached House Speaker Rusty Bowers asking for an audit and was denied.

59. On November 6, 2020, Plaintiff was contacted by an online associate from her pulmonary hypertension group, Dan Minnick, who had seen that Defendant Townsend and other lawmakers commented on Plaintiff's social media, and asked if she could help a Seattle FedEx supervisor reach the FBI to make a report of suspicious ballots. He said they had tried and were unable to get through and needed urgent help.

60. Plaintiff tried to help the woman reach the FBI but was also unable to get through. The woman told Plaintiff she had been unable to sleep for several nights due to suspicious ballots coming through and she was sure something was wrong. She said it was urgent

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<sup>12</sup> Many members of the crowd were militia consisting of current and former law enforcement, military, and first responders, who had been attending events and rallies throughout 2020 that Defendants Townsend, Harris, and Barnett spoke in front of regularly as the group brought together crowds from various Tea Party activists, Christian and anti-government groups, including those with child welfare agency and BAR association grievances, anti-vax, medical freedom, and sovereign citizen adherents and who by election day were reportedly fed up with government overreach and quite agitated.



1 because the suspicious ballots were actively coming through each day “triple beeping,”  
2 not properly postmarked and tracked.<sup>13</sup>

3 61. After being unable to reach the FBI with the woman, Plaintiff then contacted Townsend  
4 asking if she could help reach authorities because they could not get through.

5 62. Instead of contacting the FBI or law enforcement, Townsend asked Plaintiff to get an  
6 affidavit from her or give Townsend her information. She declined an affidavit but  
7 wanted an urgent investigation and for her to remain anonymous. Defendant didn’t like  
8 her answer and told Plaintiff she didn’t have a choice but to come forward because  
9 election fraud was a “matter of national security.”

10 63. Townsend continued pressuring Plaintiff that Trump attorneys in the other affected States  
11 needed to know about the woman and she believed there was election fraud. Plaintiff  
12 pressed back telling her that she had all the information necessary on the airport FedEx  
13 location and details, and if she believed there was election fraud in progress, she could  
14 send the FBI.<sup>14</sup>

15 64. *The following day, on November 7, 2020, according to witnesses, Defendant Townsend*  
16 *was at a Stop the Steal rally outside the Maricopa County Election Center when she*  
17 *spoke to Project Veritas Facebook whistleblower Defendant Ryan Hartwig. According to*  
18 *witnesses and documents from that time period, Hartwig reports he spoke with Townsend*  
19 *and learned about Plaintiff and that she received a call from the Seattle FedEx*  
20 *whistleblower.*

21 65. Plaintiff did not know Hartwig at this point. According to witnesses and notes, Hartwig  
22 spoke with Townsend at the rally. Defendant Townsend was the only person Plaintiff had  
23 spoken to about the Seattle woman.

24 66. Based on witness reports after Plaintiff shared with Townsend information about the  
25 Seattle woman, this information spread quickly at the Stop the Steal rally whose same  
26 attendees had been participating in rallies throughout 2020 with Townsend.

27 67. Also on November 7, 2020, Marko Trickovic and Liz Harris, two active members in the  
28 group since 2019, allegedly received a tip from Tyler Bowyer that a polling place had  
unattended voting machines, Trickovic and Harris posted the selfie video of them online.  
Hartwig shared the video a couple days later;

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<sup>13</sup> FBI field offices were closed to the public for walk-ins due to COVID-19, and they were apparently receiving a large volume of calls and were not picking up or responding.

<sup>14</sup> Plaintiff asked Defendant to otherwise to keep the information she shared confidential and not spread it other people outside of reaching proper authorities.



70. Several months before the 2020 election, Johnson allegedly flew Eric Schmidt to Seoul, South Korea for a meeting with the Samsung executives who were the same passengers on board the South Korean HL8230 plane in November 2020. Johnson alleged in the meeting, Schmidt and the execs talked about how they didn't want Trump re-elected.<sup>16</sup>

71. Back in 2017, the boss of the Samsung exec passengers, Jae-Yong Lee, was sent to prison after having been convicted of political bribery, embezzlement, illegally moving assets overseas, and perjury, for an 8M bribery scandal that also resulted in the impeachment and conviction of then South Korean President Park Geun-Hye.<sup>17</sup>

72. On November 7, 2020, a "spiky hair girl at the desk," named Michelle, made an apparent offhanded remark to Johnson that, "you know.. fake ballots came in on that plane [on November 5<sup>th</sup>] when it landed." Based on her comment and his prior knowledge of the Samsung executive passengers and their meeting with Schmidt, Johnson, a strong supporter of Trump and friend of Charlie Kirk, reached out to Christine Ong and sounded alerts.

73. After receiving the tip, Ong allegedly called Hartwig who allegedly called Defendant Townsend's security Marco Trickovic and Josh Barnett (2020 Congressional candidate whose campaign manager was also Townsend's associate since 2019, Shelby Busch). All these individuals had reportedly been at the rally prior to deploying to the Swift Executive airport hangar to gather pictures and videos investigating "vigilante style" as Townsend had directed while speaking at the rally three days earlier.

74. Below, Josh Barnett, is pictured with Defendant Sidney Powell and between Powell and Patrick Byrne. Between Defendant Powell and Patrick Byrne is Shelby Busch. Barnett and Busch attended rallies Townsend spoke at regularly throughout 2020, and were part of the group that in 2019 worked with Townsend "vigilante style," uncovering both child sex trafficking and election fraud. According to the group child trafficking and election fraud operate through the same networks.

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<sup>16</sup> Some conspiracy theorists believe the Bilderberg group is a powerful cabal of global elites who meet secretly to plan and implement a globalist "New World order" agenda. The group reports they are a group of wealthy and powerful political and business leaders from around the world who meet in secret to have candid discussions about global affairs and discuss how they might use their power and influence to avert wars and effect positive policymaking.

<sup>17</sup> <https://www.bbc.com/news/business-63408935#> On February 24, 2021, President Biden issued an executive order authorizing 37 Billion dollars to address a U.S. semiconductor chip shortage that was deemed detrimental to economic recovery, Biden declared the shortage a national security issue. According to media reports, Biden subsequently negotiated a pardon for Lee with South Korean President Moon on the political corruption charges securing his release from prison and in August 2022, in exchange for a semiconductor chip cooperation deal with Samsung and the U.S. [https://www.koreatimes.co.kr/www/tech/2023/06/129\\_307351.html](https://www.koreatimes.co.kr/www/tech/2023/06/129_307351.html)



75. Ong also allegedly contacted Congressman Gosar's Chief of Staff, attorney Tom Van Flien, who also deployed to the airstrip with Ong and Sarah Roork. While at the airstrip, Defendant Hartwig contacted his friend Garrett Zeigler, who was a White House staffer from Peter Navarro's office, and allegedly spoke with John Shattuck.<sup>18</sup>

76. While at the airport, Trickovic reportedly contacted Sheriff Mark Lamb who advised them to contact Phoenix Police resulting in both a police report and a Transportation Security Administration ("TSA") report (Ex. A).

77. Attempting to stop the South Korean plane, Navarro White House staffer Garrett Zeigler allegedly spoke with Deputy Secretary of Homeland Security Ken Cuccinelli and Patrick Weaver from the National Security Council. Hartwig reportedly spoke with John Shattuck who allegedly is a friend of Steve Bannon, Rudy Giuliani, Ken Klukowski, Paul Teller, Bernie Kerik, Patrick Byrne, Shawn Wilson, Sheriff Lamb, and Defendants Sidney Powell and General Mike Flynn.<sup>19</sup>

78. *Plaintiff has learned since this action was initially filed, from an audio between Garrett Zeigler and Don Johnson, that was provided to authorities by an unrelated third party,*

<sup>18</sup> Garrett Zeigler was Peter Navarro's staffer who according to his public statement let Defendant Powell, General Flynn, Patrick Byrne and others into the White House mid-December 2020 to speak with Trump as they reportedly sought to appoint Defendant Powell as special counsel to complete further investigation.

<sup>19</sup> In 2021, Defendant Shattuck stated he worked with the Pentagon to organize paramilitary teams to conduct rescue missions in Afghanistan. This is similar to the claims Shattuck made to Plaintiff in November 2020 when he sought her out alleging he works with government entities including the State Department and Pentagon to assist innocent civilians caught in international scandals.

1 *and a separate witness, that the South Korean HL8230 plane was allegedly seized in*  
 2 *Seattle on November 7, 2020, for a “reverse screen,” at the request of the Director of*  
 3 *Homeland Security Ken Cuccinelli after he was alerted to the situation. According to*  
 4 *witnesses the FBI and U.S. Marshalls allegedly seized the Korean Air HL8230 when it*  
 5 *landed in Seattle on November 7, 2020.*

6 79. According to evidence that recently surfaced, Ryan Hartwig allegedly connected what he  
 7 learned speaking with Townsend at the rally regarding the whistleblower who contacted  
 8 Plaintiff, with the South Korean plane and Samsung executive’s incident. Hartwig also  
 9 discussed his theories with Trickovic, who discussed them with Townsend and later  
 10 Plaintiff.

11 80. Allegations of a Bilderberg group affiliate being involved with the plane and powerful  
 12 elitists wanting to take down Trump only enticed the group even more. Members  
 13 vigorously sought out and targeted Plaintiff and her family seeking access to the Seattle  
 14 FedEx woman at a time when they believed getting to that woman might be the golden  
 15 ticket to saving then President Donald Trump the Presidency.

16 81. Defendant Townsend was reportedly already working directly with then President  
 17 Trump’s attorney Defendant Sidney Powell prior to the 2020 election.

18 82. *Defendant Townsend just days earlier on November 4, 2020, had incited her base of*  
 19 *QAnon adherents, militia groups, and Stop the Steal followers to go out vigilante style*  
 20 *and find proof of and gather affidavits of election fraud. According to a witness, on or*  
 21 *around November 8, 2020, rally attendees began discussing how to locate Plaintiff to*  
 22 *obtain her court protected address information as they now desperately sought*  
 23 *information on how to reach the Seattle woman.*<sup>20</sup>

24 83. *On November 8, 2020, Plaintiff was contacted by attorney Brandon Paroly from the*  
 25 *Trump campaign alleging the campaign learned she had a whistleblower at a mail*  
 26 *facility in Seattle. On this call, Paroly told Plaintiff that the night before, there had been*  
 27 *a group out at the airport and reports of a plane allegedly stuffed with fake ballots flew*  
 28 *into Sky Harbor and went to Seattle [the same location as the SEA FedEx airport*  
*whistleblower that had contacted her].*

84. *The day after the group had been at the airport and the South Korean plane was*  
*allegedly seized and raided in Seattle by Homeland Security, Paroly contacted Plaintiff*  
*and insinuated there was a possible connection between the Korean plane and the*  
*woman who spoke with Plaintiff.*

---

<sup>20</sup> An extremism reporter on the ground in the crowd reportedly communicated within their networks concerns that Plaintiff might be in danger because of the rumors about her and the “mail facility whistleblower,” along with the intensity of which Plaintiff and the Seattle woman was sought after for the desired information.

1  
2 85. According to witnesses, the Trump campaign attorneys learned about Plaintiff and her  
3 Seattle whistleblower from Defendants Hartwig and Townsend. Defendant Townsend  
4 had been working with Trump campaign attorneys on election integrity well before the  
2020 election, after she reached out to the White House with her theories regarding  
“Federal only ballots,” might be a source to steal the 2020 election from Trump.

5  
6 86. Beginning on or around November 8, 2020, shortly after rumors had spread at the Stop  
7 the Steal rally, Plaintiff and her family started having people show up outside her home  
8 stalking, surveilling, and attempting to hack her home network. Police were called and  
reports were made, and some incidents were captured on Plaintiff’s home security  
cameras. Others were in the wash behind her home which evaded security cameras, but  
Plaintiff took photographs of individuals hiding in bushes.

9  
10 87. The day after speaking with the Trump campaign attorney, on November 9, 2020, two  
11 men showed up lurking outside Plaintiff’s home, which analysts later alleged hacked into  
12 her network and security system. As the men were lurking outside her home with devices,  
13 Plaintiff’s security system went offline and a new device was added to the control of her  
home security cameras, removing Plaintiff from being primary controller of the access. A  
police report was made shortly thereafter.

14  
15 88. Days earlier, Defendant Townsend contacted Plaintiff and gave her the number for her  
16 security Marko Trickovic who was also asking Plaintiff for the Seattle woman’s  
17 information. Plaintiff did not provide Trickovic the woman’s information because by the  
18 time she spoke with Trickovic, the woman decided she wanted to remain anonymous.

19  
20 89. On November 10, 2020, Trickovic sent Plaintiff a text message forwarding Sheriff  
21 Lamb’s phone number, along with John Shattuck’s contact info. Trickovic told Plaintiff  
22 that Sheriff Lamb<sup>21</sup>, wanted to “get Deputies to watch over [Plaintiff].”

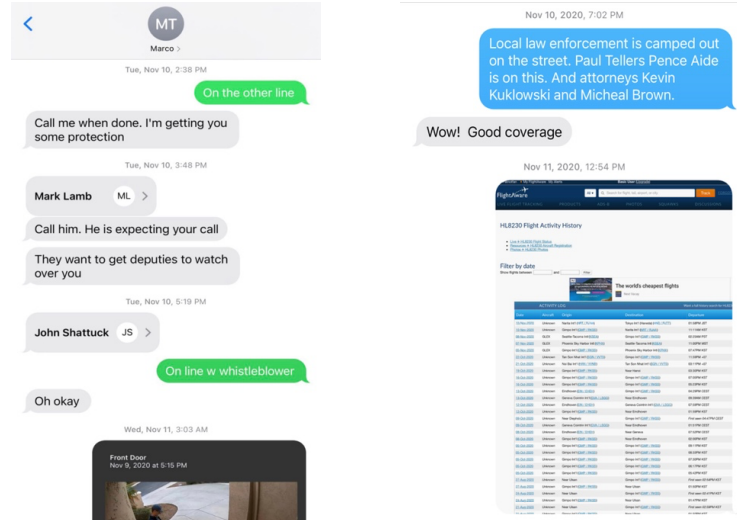
23  
24 90. According to Trickovic, John Shattuck contacted Trickovic and pressured Trickovic  
25 aggressively to put him in touch with Plaintiff. Defendant Shattuck said he was working  
26 with Ken Klukowski and per his words “Mike Pence’s chief staffer” Paul Teller.<sup>22</sup>  
27  
28

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<sup>21</sup> At this time Sheriff Lamb was stating both publicly and later to Plaintiff that he believed there was election fraud. Lamb also attended the Stop the Steal rally with Defendants Hartwig, Townsend, Harris, Busch, and Trickovic.

<sup>22</sup> The text below was voice dictated and spelled wrong as “Kevin,” when it was Ken Kuklowski, who worked for Department of Justice (“DOJ”). According to news reports on December 15, 2020, six weeks later, Klukowski was moved as Deputy official under Jeffrey Clark at the DOJ.





91. Shattuck contacted Plaintiff alleging his role is to help Americans who “find themselves entangled in international incidents,” recommending she look up a news article of him and Haiti securing the release of Americans wrongfully imprisoned in Haiti. Shattuck said he works regularly with the State Department and Pentagon, along with various groups on the border, and is a friend of Defendant Flynn, Roger Stone and Steve Bannon.
92. Shattuck told Plaintiff he was in direct contact with Rudy Giuliani and Defendant Sidney Powell, as well as Paul Teller and Ken Klukowski from the DOJ regarding the Korean Air incident. Shattuck said the “pilot” was interviewed by authorities on November 8, 2020, kept changing his story alleging there was “definitely something shady going on there.” Shattuck stated his sources told him there were two arrests in Seattle by U.S. Marshalls connected with the plane.
93. At no time did Defendant Shattuck ever disclose to Plaintiff that the “pilot” he referred to at that time was “the source.” This is something Shattuck likely already knew or should have known at that time. Instead, Shattuck led Plaintiff to believe that “the pilot” interviewed was part of the alleged fraudulent ballot operation and was not credible. At the time, Shattuck and the others involved told Plaintiff the source was an “executive staffer of a ‘high level’ Democrat who was part of a meeting in which they discussed wanting to take Trump out in the 2020 election.”
94. It was not until recently in 2023, that Plaintiff learned the “pilot” and the “executive staffer of a ‘high level’ Democrat,” who overheard the alleged meeting, were the *same* individual. If Defendant Shattuck’s claim that the “pilot” was interviewed by authorities on November 8, 2020, Shattuck and his associates Patrick Byrne, Defendant Powell, and Defendant Flynn, who were meeting together in person in Washington D.C., in mid-December 2020, knew or should have known on November 8, 2020, assuming Johnson was “the pilot” Shattuck was referring to, was their “source” and was not credible.

95. At this time in mid-November 2020, Defendant Shattuck continued pressuring Plaintiff to put him in touch with the Seattle woman who was willing to speak over the phone for a conference call but otherwise wanted to remain anonymous. Defendant Shattuck pressured Plaintiff offering to fly to meet the Seattle woman and take her to meet with Rudy Giuliani personally.
96. Over the next few weeks and months, unknown persons, presumably former law enforcement or intelligence agents, or other supporters from the Stop the Steal rally that Defendant Townsend and/or Defendant Flynn mobilized as vigilantes to go out and gather as much proof of election fraud as possible were lurking and surveilling outside her home, following, as well as breaching her property on more than one occasion.
97. As unknown persons continued showing up outside Plaintiff's home surveilling outside and in bushes for another few weeks. Police reports were made at the time and security camera footage and photographs of such individuals in bushes and security footage of attempted break-in reported to police were preserved where possible.
98. On November 13, 2020, Defendant Townsend issued a press release that 36,473 voters did not prove citizenship. On January 6, 2021, Trump quoted that number stating Arizona had 36,473 noncitizen voters. Townsend later alleged she did not say 36,473 noncitizens voted, just that it is possible they did if they committed perjury on the form since proof of citizenship was not required.



99. On November 14, 2020, then sitting President Trump identified Defendant Powell as part of his legal dream team, spearheading citizen's right to free and fair elections.
100. Also on November 14, 2020, at Wesley Bolin Park across from the Arizona Capitol, Defendant Townsend participated in a rally with a religious activist group blowing shofars addressing the crowd continuing to incite the crowd to 'rise up' in the spiritual battle between good and evil. At that event, Defendant Townsend spoke on stage next to QAnon shaman Jake Chansley, and Oathkeeper co-founder and Constitutional



Sheriff leader Sheriff Mack, who had attended the Bundy Ranch standoff with Defendant Townsend, urging the crowd to put pressure on her fellow legislators for an audit.<sup>23</sup>

101. Plaintiff became of particular interest to the group after Defendant Townsend shared that Plaintiff knew the identity of what the group viewed as a “hot lead” in the Seattle whistleblower.

102. This event of the alleged seizure and raid of the plane by Homeland Security and the FBI happened before Plaintiff learned anything about the South Korean plane or the “tip.” Plaintiff learned about it after the fact on the following day when Trump campaign lawyer Brandon Paroly, contacted her and insinuated there was a possible connection between the South Korean plane and the Seattle woman who contacted her.<sup>24</sup>

103. In early November 2020, Tolley alleged Defendant Townsend asked Tolley for Plaintiff’s physical address. After speaking with Townsend regarding the Seattle FedEx whistleblower and the plane incident, Sommer Tolley, a rally attendee and associate of Townsend and Trickovic, sought contact with Plaintiff.

104. On or around November 16, 2020, a woman named Sommer Tolley an associate of Defendant Townsend who had been attending rallies with her throughout 2020, social engineered her way into Plaintiff’s home offering to come help her study. At the time Townsend was repeatedly telling Plaintiff she was in danger for sitting on the Seattle whistleblower information and not putting it out. Scared and confused by these strange events, while also needing help studying, Plaintiff agreed to allow Tolley to come over.

105. Once in Plaintiff’s home, Tolley told Plaintiff she had a friend, Scott Koch, who worked for the Department of Defense (“DOD”) and when she spoke with him Plaintiff, he told her already knew about Plaintiff and the plane before Tolley told him anything.<sup>25</sup> Plaintiff asked Tolley to call him. Once on the phone, Koch said he worked for the government, had information about the plane, and wanted to speak to her but would only speak in person. Plaintiff agreed to allow Koch into her home later that evening only because of his apparently false representations of working for the government made by both Tolley and Koch.

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<sup>23</sup> Plaintiff did not learn about many of the rallies, activities, statements, and context by Defendant Townsend until 2022 or in some cases 2023.

<sup>24</sup> It should be noted that also in 2023, Plaintiff in looking over the texts preparing this action, noticed that the Seattle woman when she reached out to Plaintiff in November 2020, also sent Plaintiff the same QAnon recruitment tool which Defendant Townsend had repeatedly tried to get her to watch in the summer of 2020.

<sup>25</sup> Plaintiff learned that Koch frequently attended rallies which Defendant spoke at and according to a witness, in the summer of 2020, Koch alleged he knew Kelly Townsend and had her cell number. Koch told the witness he was waiting for Defendant to finish speaking and according to the witness, when she finished, Defendant approached them addressing Koch by his first name.

1 106. Once Koch was in Plaintiff's home, Tolley urged her to show Koch the security  
2 footage of the men outside who had been surveilling. Koch identified one of the men as  
3 Jimmy Kung. At this point, Florence police had not identified the men from the footage  
4 Plaintiff provided them. After looking up the man Koch identified, it appeared he could  
be a possible match.

5 107. With Tolley and Koch as relative strangers in her home, and Koch identifying one  
6 of the men who was lurking outside her home and had apparently hacked into her  
7 network, coupled with Defendant Townsend's statements, and the then recent security  
8 issues, Plaintiff felt very uneasy with both Tolley and Koch in her home with her alone.

9 108. Plaintiff used training from a self-defense course, along with people pleasing  
10 surviving domestic violence, to placate, engage, and agree with both Tolley and Koch, in  
11 order to protect herself in what she thought might possibly be a dangerous situation. At  
12 the time, when the group was pressuring for the FISA affidavit and as part of refusing to  
do the FISA affidavit, revealing she secretly recorded Koch because she felt something  
was "off" with what was happening. Plaintiff told everyone involved, including  
Defendants Townsend, Powell and Flynn, at the time, this was why she secretly recorded  
Koch.<sup>26</sup>

13 109. During that visit and conversation on November 16, 2020, Koch attempted to  
14 build trust with Plaintiff claiming his agents were security for Democrat Congressman  
15 Mark Kelly. He showed Plaintiff detailed logs and reports of their activities as their  
16 security detail as proof. Koch stated, "his guys," were security as ballots that influenced  
17 the election in Biden's favor, were unloaded from that South Korean plane (with tail  
number HL8230), and taken to the election center while alleging others went to Las  
Vegas via FedEx.

18 110. When Defendant Powell allegedly sent a team of former FBI agents to interview  
19 Koch in December 2020, he allegedly recanted saying he fabricated everything to  
20 "impress Plaintiff." He allegedly told another witness that he made it up to find out what  
21 Plaintiff knew about the South Korean plane. And in yet another version, continuing his  
22 fabrication that he was a government official claimed he was an undercover FBI  
23 informant investigating Defendant Townsend and her associates.

---

24  
25  
26 <sup>26</sup> When Koch initially came to her home representing himself as former Sheriff Deputy and agent with DOD, he  
27 expressed concern about surveillance from devices. He asked Plaintiff initially to remove these from the room while  
28 he spoke to her, but later retrieved her phone to show him the photos of the men. Unsure of Tolley and Koch's  
motives were in what appeared as possible social engineering their way into her home, Plaintiff secretly recorded the  
conversation and repeating back things Koch said as well as things she had been told by Defendant Townsend  
throughout 2020 understanding both Tolley and Koch had allegedly attended rallies with her.

111. The following day, Shelby Busch contacted Plaintiff. Busch alleged Defendant John Shattuck sent her. Busch told Plaintiff she was in Washington D.C., with Rudy Guiliani, Defendant Sidney Powell, Phil Waldron, and the “cyber team.”

112. With Tolley still in Plaintiff’s home and Trickovic on the phone, several calls took place with the Guiliani and Defendant Powell’s team placing extreme pressure on Plaintiff to urgently sign an affidavit alleging what both Koch and the Seattle woman told her.<sup>27</sup>

113. Plaintiff was told it was urgent and they needed her affidavit right away to secure a FISA warrant to seize the Maricopa County Election Center, and allegedly those in Pennsylvania, Georgia, and Michigan, based on the Seattle woman’s and Koch’s allegations. Plaintiff was told it was urgent to do it before the election was certified.

114. ***Based on alleged foreign national security issues, alleged fraudulent ballots, Koch’s statements, the Seattle woman’s claims, the group put frantic and intense pressure on Plaintiff to quickly and immediately sign an affidavit that would allow them to obtain a FISA warrant to seize the physical property (including voting machines, equipment, and paper ballots) of the Maricopa County election centers.***

115. Despite extreme pressure at the time, Plaintiff repeatedly refused to sign an affidavit asking for such an extreme measure without knowing more about Koch, including whether he was who he said he was along with him making other outlandish claims.

116. As Busch pressured for the affidavit, she claimed there would be truth mixed in with lies. Plaintiff was told all she needed to do was put in the affidavit the relevant facts of what both the Seattle woman and Koch told her, and there was no risk since what she would be stating was accurate. The group intensely pressured they needed it right away to get the FISA warrant. Plaintiff was very uncomfortable with the extreme pressure and urgency under which they were demanding that she do the affidavit.

117. Defendant Townsend also pressured Plaintiff for the affidavit further validating Koch’s story claiming she was outside the election center and personally witnessed Koch behind the line in a restricted area while ballots were being counted acting nefariously.<sup>28</sup>

118. Plaintiff refused to sign the affidavit for the FISA warrant despite the intense pressure telling her it was critical she do it, that it could be the one thing that could save Trump and Arizona. On November 18, 2020, communicated her refusal with her doctor

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<sup>27</sup> When Tolley came to Plaintiff’s home, they planned for her to spend the night because it was some distance to Plaintiff’s house and Plaintiff expected that they would stay up late working on the outline.

<sup>28</sup> Plaintiff had never met or spoken to Daniels at this point, but Daniels later confirmed Townsend’s account and said at her prompting, he had approached Koch and Wilson to inquire and identified them.

Hi. Checking in....

Nov 18, 2020, 8:12 AM

Decided not to go through with it. Just need to live with no regrets now and make peace with it. He would have won if he had Arizona.

I decided not to call Sommer and called Daryl. He came with lots of support and now Senator Kelly. ❤️

Scott Koch lives in Coolidge (Lamb's territory) and ran for Mayor.

I'm relieved.

Nov 19, 2020, 10:27 AM

WH used my call reporting the incident (recorded without my knowing) and used it to get FISA warrant stopping certification in AZ. What we talked about is being offered, I can take it or leave it, but I'm involved now regardless. I can provide the evidence or not, but it's going forward.

Yes! I watched Giuliani Et al this am, thought maybe they did. We will talk tomorrow. Do you still have protection?

No. I thought I was safe and not going forward.

Nov 19, 2020, 12:22 PM

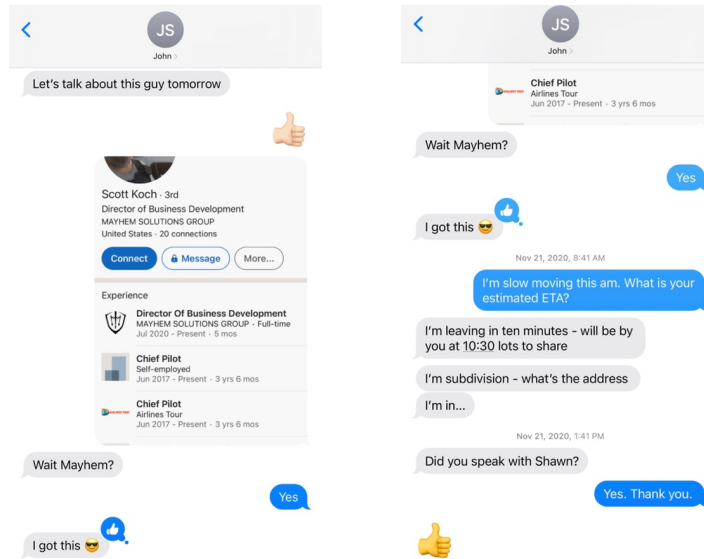
Can we talk?

I'm with Jack

I can talk tonight after he leaves

Ok thank you

121. On November 20, 2020, Maricopa County certified the election. Plaintiff, thinking the events were strange, *decided to look up Koch anyway* via Google search. She found Koch's LinkedIn that he worked for Mayhem Security, not DOD as he stated and sent the screenshot to Defendant Shattuck. Shattuck responded by phone and text that he coincidentally knew Koch's boss Shawn Wilson, from Mayhem Security Solutions and said he would come over the next day and speak in person.



122. On November 21, 2020, *the day following certification*, Shattuck came over and told Plaintiff Koch was going to be fired by his boss Shawn Wilson, for bringing his company into it. Plaintiff told Shattuck that Koch had not mentioned Mayhem and offered to speak with Wilson to clear things up. On his way out the door Defendant Shattuck showed her a pictured of a deceased man shot assassination style on his phone saying “this is the kind of stuff I get sent to me,” and if she needed anything he would be “nearby.”

123. After Shattuck left, Plaintiff contacted Wilson and told him Koch had not mentioned his company and played the audio in which Koch spoke. Wilson told Plaintiff there was definitely election fraud and he spent 28 years in Washington D.C. and he knows there is fraud with the machines. He told her Koch has government security clearance and he is credible. He urged her to make five copies of the audio and give it to five people.

### ATTEMPTED BREAK-IN AND FLORENCE POLICE LEAVING BEHIND HEAVILY ARMED PARAMILITARY GROUP

124. Later that evening as she was making copies of the Koch audio recording, Plaintiff received a security camera motion alert, and saw on the camera someone running away from her house in her yard. A neighbor who had come over to go to the store with Plaintiff to get the flash drives, was with Plaintiff in the house as they called 911, and while on the phone with 911, Plaintiff shared the security camera video clip with Shattuck who responded he was on his way with Wilson.

1 125. Shawn Wilson was previously a detective for Plaintiff's County Sheriff Mark  
2 Lamb. On November 10, 2020, after Defendant Townsend encouraged him to reach out  
3 and connected them, Marco Trickovic said Lamb wanted to get deputies to watch over  
4 Plaintiff due to the lurkers outside her home following the Korean Air incident.

5 126. Plaintiff was very distraught and shaken up when police arrived. Plaintiff told  
6 Florence officer Cody Linderoth she had a genuine fear for her life and safety. She told  
7 the officer she sent the security camera video to Defendant Shattuck who was working  
8 with then President Trump's lawyers and the Department of Justice and she was scared  
9 because he sent her a text that he was bringing the boss of the guy who claimed his guys  
10 were part of the alleged ballot fraud and Koch had said if anyone got too close they  
11 would be discredited, or killed in an accident or suicide, or arrested on false charges and  
12 she feared for her safety.

13 127. Plaintiff told Officer Linderoth the security contractor was Shawn Wilson. She  
14 told him she was skeptical and afraid of what was going on with Shattuck bringing  
15 Wilson over since it was Wilson's employee Koch, who was allegedly part of the  
16 criminal activity that associates of Shattuck had just tried to get her to do an affidavit for  
17 a FISA warrant and was the same guy Defendant Townsend said she witnessed at the  
18 election center behind the line while ballots were being counted.

19 128. Defendant Shattuck and Shawn Wilson arrived on the scene a couple of minutes  
20 later. It appeared the officers were familiar with Shawn Wilson.<sup>29</sup> Plaintiff learned later  
21 that Wilson had previously worked for her County Sheriff Mark Lamb.

22 129. Plaintiff was on oxygen, clearly distraught, shaken up, and afraid of what was  
23 happening. Due to her physical condition and disabilities, prior to this date, on this date,  
24 and through the present, has been deemed by the State of Arizona as a vulnerable adult  
25 under A.R.S. 13-3623(F)(6). Plaintiff was wearing her oxygen that day as Florence Police  
26 were in her home and it was apparent she was physically compromised and vulnerable.  
27 Plaintiff's neighbor alleged she told the officer that Plaintiff was vulnerable, and she  
28 believed the men in Plaintiff's home were lying and manipulating her. Plaintiff did not  
learn her neighbor told the officer this for over a year later.

130. The Town of Florence at all times relevant had responsibility for the adequate  
oversight, proper training, and supervision, of peace officers within its jurisdiction.

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<sup>29</sup> It appeared officers knew Wilson as he worked for Sheriff Lamb and their Pinal County jurisdictions overlapped. Defendant John Shattuck told Plaintiff he was a good friend of Sheriff Lamb and they had attended a Trump rally together with their wives. Sheriff Lamb later claimed he did not know who Shattuck was, but that he had lunch with Wilson every three months or so. When Plaintiff spoke with Sheriff Lamb after Trickovic gave her Sheriff Lamb's number and she spoke with him, he told Plaintiff he believed the claims of election fraud were legitimate.



1  
2  
3 131. The Town failed to properly train and supervise its officers in a manner that  
4 ensured once on scene after Plaintiff called 911 on November 21, 2020, for an attempted  
5 break-in, left the scene with Plaintiff, a vulnerable adult under Arizona law, in dangerous  
6 condition with a heavily armed paramilitary security team, known to Florence Police and  
7 Pinal County Sheriff Mark Lamb, occupying her home ushered in under false pretenses  
8 for the purpose of obtaining information the group believed she had access to related to  
9 voter fraud as well as managing and controlling the political narrative surrounding the  
10 groups employee, former Sheriff Deputy Scott Koch.

11  
12 132. On November 21, 2020, when Town of Florence Police officers arrived on scene  
13 a legally formed “special relationship” was established with Plaintiff.

14  
15 133. On November 21, 2020, Officers Cody Linderroth, Ian MacFie and Chris Byrne,  
16 were mandated reporters pursuant to A.R.S. 45-454(a), and failed to recognize the risks  
17 and dangers of leaving an intimidating heavily armed paramilitary security group in the  
18 home of a disabled adult single female occupant of the home.

19  
20 134. Plaintiff is physically compromised and was wearing oxygen at the time officers  
21 responded to her 911 call on November 21, 2020. Although use of oxygen alone may not  
22 be sufficient for an officer to determine if Plaintiff was a vulnerable adult, it was an  
23 indicator that given proper training and supervision should have prompted a further  
24 inquiry into Plaintiff’s condition and status to assess whether she was a qualified  
25 vulnerable adult in need of extra precaution for care and safety in order to fulfill duties  
26 under A.R.S. 454(a).

27  
28 135. By leaving the scene with Plaintiff in an unsafe situation with a paramilitary  
security group that engaged in coercive control, fear, and intimidation, Defendant Town  
of Florence failed in its duty to exercise proper care and adequate oversight and  
supervision of its officers.

136. In front of Florence Police, Defendant Shattuck while speaking on the phone with  
Defendant Townsend, who had been in contact with Sheriff Lamb, told Wilson they  
needed to, “get a team on her [referring to Plaintiff].” Within minutes, more heavily  
armed men arrived who were former law enforcement and part of Wilson’s security  
group. Officer’s Linderroth, Ian MacFie and Chris Byrne, then left the scene leaving  
behind Wilson’s heavily armed security detail in Plaintiff’s home.

1 137. Defendant Townsend got on the phone with Plaintiff while she was very shaken  
2 up with the officers there and reiterated Plaintiff and her family were in danger and she  
3 needed the security team, Plaintiff said she could not afford a security team, for which  
4 Defendant Townsend like Shattuck said they had it covered. "You need it," she said.  
Take the security. She added she was also going to mail Plaintiff something. When the  
object arrived days later it was a Faraday bag, something Plaintiff had never heard of.

5 138. Wilson and his team of former law enforcement spent days telling Plaintiff and  
6 her family the election fraud was true and Wilson was trying to get to the bottom of it  
7 because they believed Koch might have even used some of his own agents to pull off the  
8 illegal ballot running operation. During this time Defendant Shattuck and Wilson told  
Plaintiff that Wilson was in direct contact with Defendant General Flynn and had  
provided an affidavit to the Powell team to help them get to the bottom of it.

9 139. Wilson's heavily armed "security" team was intimidating and scared Plaintiff and  
10 her family. The team and Wilson pointed out several security issues showing Plaintiff  
11 SUV tracks in the wash where they alleged a certain kind of SUV was used. Wilson told  
12 Plaintiff he observed men sitting in the desert wash behind her home on ATVs surveilling  
her house and men in a car outside her home surveilling.

13 140. Plaintiff believes the people stalking and surveilling her home were likely Stop  
14 the Steal and QAnon affiliated rally participants carrying out the directive Defendant  
15 Townsend gave to the group on November 4, 2020, while representing herself as House  
16 Election Chair alleging she and her colleagues had plenary power to investigate election  
malfeasance and needed her followers to go out and gather affidavits and evidence.

17 141. In the midst of all the chaos, with Florence Police present coming in and out of  
18 her home, neighbors who came over to check on Plaintiff, and Plaintiff being completely  
19 shaken up and overwhelmed by the attempted break-in given the circumstances,  
20 Defendant Shattuck and Shawn Wilson had urged her to give each of them one of the  
21 flash drives containing the audio recording Plaintiff secretly recorded of Wilson's  
employee, Scott Koch (per Wilson's recommendation from earlier that day).

22 142. At this time, Wilson was told Shattuck he would cooperate with any investigation  
23 Defendant Shattuck was working on and would prosecute Koch for his claimed  
24 participation in ballot fraud. Given that Shattuck and his associates had direct contact  
25 with the President and his team, Plaintiff believed Shattuck was affiliated with the State  
26 Department and Pentagon as he stated. When Plaintiff played the recording of Koch over  
27 the phone to Wilson earlier that day, Wilson alleged adamantly there was election fraud  
28 and the things Koch said were "credible," he was a member of the Koch family, and  
Koch did have DOD security clearance.



1 143. In the week following this, while Wilson's security team was in Plaintiff's home  
 2 "protecting" her, Wilson told Plaintiff he had listened to the hour-and-a-half-long  
 3 recording of Koch thirteen times, which seemed odd, and spoken to Defendant Shattuck  
 4 several times throughout the week. Shattuck also confirmed Wilson was speaking with  
 5 Defendant General Flynn.

6 **DEFENDANTS POLITICAL AGENDA OPERATING AS**  
 7 **ALLIES AND AGENTS OF AND WITH THEN PRESIDENT TRUMP**

8 144. With Plaintiff and her family terrified, overwhelmed, and concerned with what  
 9 was happening around them, Defendant Shattuck repeatedly told Plaintiff, "This is what  
 10 you want, this is whom you want to be in touch with," as he moved very quickly in his  
 11 words "making a hundred calls a day," and having various people contact Plaintiff or  
 12 urging her to call various people.

13 145. Within a day or so, Plaintiff continued receiving calls from powerful people such  
 14 as Bernie Kerik, Sidney Powell, General Mike Flynn, and others inquiring about the  
 15 South Korean plane, asking for the Koch recording she made, and details on what the  
 16 Seattle woman told her.

17 146. Defendant Shattuck also repeatedly pressured Plaintiff to call Colonel Tony  
 18 Schaffer who was working with the Trump campaign investigating election fraud. When  
 19 she did, Shaffer instructed Plaintiff to write everything up in a report and get it to him by  
 20 the next day. Plaintiff did not do this because she was not trying to reach Shaffer and was  
 21 still extremely shaken up and not interested in writing a report. She told Shattuck she  
 22 only called because Defendant Shattuck was repeatedly pressuring her to and she was not  
 23 going to write up what she was told by them in a report.

24 147. During speeches in front of the Capitol and Maricopa County Election Center,  
 25 Defendant Townsend in her role as House Election Chair and leader of the movement,  
 26 urged the crowd to go "vigilante" and collect affidavits, and any other proof of election  
 27 fraud to save President Trump. Plaintiff contends this is what caused her associates and  
 28 the crowd to target Plaintiff for information, which included Townsend's alleged  
 associate Scott Koch, whom she had been witnessed speaking to at least once at rallies  
 she led and spoke at in the summer of 2020. It was not clear in the beginning that many  
 of the various people swarming Plaintiff in those days had all been attending rallies with  
 Defendant Townsend since Plaintiff had not left her home and was not attending any  
 rallies.

148. During this time, while Wilson's group of former police officers were in her home  
 repeatedly telling Plaintiff and her family their lives were in grave danger along with

1 claiming the election was “rigged.” Wilson’s officers reinforced statements Koch made  
2 alleging to Plaintiff they believed the money behind election rigging was part of “off the  
3 books” government contractor operations and this is how Koch was involved.

4 149. These former police officers working for Wilson claimed that contractors are  
5 hired either directly or indirectly by government agencies to pull off “black ops” type  
6 operations such as what Koch alleged, and that this kind of stuff is done all the time.

7 150. One of Wilson’s security officers added that the same people who allegedly hired  
8 Koch to take part in the ballot running operation will easily hire cartels to kill Plaintiff  
9 and her family, set her up or frame her for a crime, or smear her very publicly so that no  
10 one would believe her in order to conceal their activities.

11 151. During this period, Wilson’s team asked questions about every aspect of  
12 Plaintiff’s life and history, which she believed was necessary to protect her and her  
13 family from an attack should those involved in rigging the elections come after her.  
14 Plaintiff and her family felt terrified, vulnerable, and completely trapped with no options  
15 but to cooperate or be killed. Given that the police were present when Wilson’s team was  
16 ushered in and he knew them, Plaintiff and her family complied with whatever the  
17 heavily armed and intimidating security team told her to do believing it was necessary for  
18 their survival.

19 152. When Defendant Townsend’s security Trickovic learned that Wilson’s team was  
20 asking detailed questions about Plaintiff’s life, he told Plaintiff that was not normal for a  
21 security detail. Also, at this time Trickovic’s partner, Steve Daniels, who was also  
22 providing volunteer security for Defendant Townsend during the Stop the Steal rallies  
23 outside the election center, allegedly reminded Trickovic that Defendant Townsend had  
24 pointed out to Daniels that she witnessed both Wilson and Koch behind the secure line  
25 while ballots were being counted. Plaintiff had not yet met Daniels at this point.

26 153. Trickovic contacted Carissa Keshel on Defendant Sidney Powell’s team and told  
27 her about Daniels and Townsend seeing both Koch and Wilson at the election center.  
28 Keshel contacted Plaintiff and told her that they were going to switch out security teams  
because there were “concerns.” She did not disclose to Plaintiff why they were switching  
teams. After the teams were switched out, the LAP team, specifically Geoffrey Flohr, told  
Plaintiff they were switching out the teams because Flynn’s team had reliable proof  
Wilson was “dirty,” and he was manipulating to find out what Plaintiff knew because he  
was also “in on,” the ballot fraud. In a phone call months later, Defendant Mike Flynn’s  
brother Joe Flynn told Plaintiff, that they switched out the team because Wilson was  
asking for 30K for the “op” and they “did not have that kind of money.” Joe Flynn  
apparently did not know that his team had repeatedly told Plaintiff they switched out the  
team because they confirmed Wilson was “in on it.” As of 2023, photos surfaced online

of Wilson attending “patriot” events for the organization #theamericaproject operated by Defendants Flynn and Powell. An email also went out to Liz Harris’s list that was passed onto Plaintiff that Shawn Wilson has been participating in conference calls with Harris as of 2023.

154. When Plaintiff told Wilson that Defendant Flynn was sending a team they planned to switch out and replace him. Wilson became irate and angry, yelling that he was “not good enough to do work for General Flynn?!?” As Wilson yelled continuously on speakerphone Plaintiff was quietly shaking and crying terrified by his rage. Wilson’s security agent, a former police officer, told Wilson Plaintiff was breaking down and he needed to stop. Later that night Wilson called Plaintiff and said he knew all the law enforcement in the state, and she better not cause any trouble for him or else. Wilson told Plaintiff he was already in enough trouble for a justified shooting incident.

155. Plaintiff told Wilson she did not understand what was happening and was merely letting him know so he could plan because he had complained the day before that Flynn’s group hadn’t paid him. When Defendant Shattuck brought him in she told her he wasn’t charging her for security because he was doing it as a “favor to John.” She had been worried how much it would cost for all the heavily armed officers in her home and thought if he wasn’t getting paid and it was costing him, it would be a good thing they were switching teams.

156. During this time period, Defendant Mike Flynn and John Shattuck confirmed they were in direct communication with Shawn Wilson. Shattuck confirmed he was also speaking with Defendant Flynn and Guiliani regularly during this time.

157. The following day on November 22, 2020, the Trump campaign issued a statement that Powell was not part of the Trump legal team, nor was she acting in any way as his personal lawyer. Defendant Powell stated she was still part of President Trump’s legal team, the statement was just issued publicly to allow her freedom to pursue claims without as many limitations.

#### **DEFENDANT TOWNSEND PRESSURE CAMPAIGN ACTING UNDER COLOR OF LAW AS HOUSE ELECTION CHAIR**

158. On or around November 23, 2020, Defendant Townsend contacted Plaintiff, gave her House Speaker Rusty Bower’s phone number, and told her to contact Bowers and tell him about the Seattle woman, Koch, and the plane. She added, “be sure to record it.” Plaintiff did as Townsend asked and spoke to Rusty Bowers the following day and told him what she knew. He let Plaintiff know he would pass the info on to law enforcement, but he didn’t think what she told him would “affect Monday.” At that point Plaintiff

1 didn't know what was happening "Monday," and later learned it was the date for the  
2 statewide certification, where the 20<sup>th</sup> was just Maricopa County.

3  
4 159. On or around November 28, 2020, Defendant Townsend told Plaintiff she wanted  
5 her to come down and testify about the plane, Koch, and Seattle woman at the Giuliani  
6 hearing to be held at the Hyatt on November 30, 2020. Plaintiff told Defendant Townsend  
7 she did not want to go to a crowded event of people as she was not leaving her house due  
8 to COVID.<sup>30</sup>

9  
10 160. Defendant Townsend told Plaintiff she could get a room and stay in the room with  
11 her security team and Defendant would stay in the room with her and then she would  
12 have her come down to the conference room just when they needed her to testify.  
13 Wilson's security team went with Plaintiff to the hotel and stayed in the suite with  
14 Plaintiff and Defendant Townsend. Defendant Shattuck also joined staying in a separate  
15 bedroom in the suite Plaintiff got.

16  
17 161. On or around November 25, 2020, Shattuck recommended Plaintiff speak with  
18 attorney Mark Goldman, whom Shattuck said worked for Jerry Sheridan's campaign.  
19 Plaintiff told Goldman she was trying to reach the FBI for the whistleblower when she  
20 reached out to Defendant Townsend and everything happened. He told her he would have  
21 the FBI call her. Plaintiff received a missed call from the Phoenix FBI field office, but no  
22 message was left, and when she called back the field office clerk attempted but could not  
23 identify who it was that tried to call her.

24  
25 162. Plaintiff messaged Shelby Busch it seemed the hearing was a dog and pony show.  
26 Busch, who was working directly with Giuliani and Colonel Waldron responded "wtf."  
27 Plaintiff was later told the group including Defendant Townsend had questioned  
28 Plaintiff's loyalty after Plaintiff had refused to do the FISA warrant affidavit and the  
group already had concerns that she was not a "team player."

29  
30 163. After watching part of the hearing, Plaintiff messaged Defendant Shattuck she  
31 thought it was a "show" and was leaving to go home. Defendant Shattuck responded  
32 asking if he could come up with Congressman Gosar, whom Plaintiff had never met. She  
33 agreed. When Plaintiff opened the door, she was surprised by an ambush in which  
34 Defendant Shattuck brought eight people or so into the room, including Congressman

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<sup>30</sup> Plaintiff was homebound throughout 2020 (except for leaving her home on rare occasion for groceries and to listen to Defendants speech at one rally which she stayed in the car and when Defendant came up to the car Plaintiff refused to open the window near the crowds) due to her disability and high risk for COVID-19.

Gosar, Ann VanDerSteel, Josh Barnett, Daniel Wood, Shawn Wilson, a camera crew, and a short time later Jerry Sheridan and Michelle Malkin.



164. Plaintiff requires oxygen with any physical demand or stress. She was not wearing her oxygen at the time and the ambush surprised Plaintiff and caused her heart to race and feel lightheaded and faint. Startled and taken off guard by the swarm of people, Defendant Shattuck asked Plaintiff to tell Congressman Gosar the story of what happened with the Seattle woman and Koch. Congressman Gosar intimated the situation was very serious and Plaintiff should send him the security camera image of the guys outside her house so he could get someone to do facial recognition.

165. On November 29, 2020, while at the hotel with Plaintiff, Defendant Townsend and General Mike Flynn were on speakerphone as they discussed plans including for the hearing the following day with Giuliani and Colonel Waldron. When Defendant Townsend let Defendant Flynn know she was on speakerphone, Plaintiff briefly discussed with both, their plans to switch out her security team from Wilson's Mayhem to 1AP.

166. Defendant Townsend was in regular communication with Defendant General Flynn during this time. Wilson's team also provided security for the event. Rudy Giuliani

and Phil Waldron presented election fraud evidence to other legislators which Defendant Townsend and her followers had been gathering and investigating.<sup>31</sup>

167. At the November 30, 2020, hearing held at the Hyatt Hotel in which Defendant Townsend and a panel of Arizona legislators, led by Rudy Giuliani and Phil Waldron sat on a dais in an official appearing hearing and listened to several witnesses including Defendant's associate Liz Harris, present data that she had collected through canvassing and knocking doors with Defendant Townsend that month in November. This hearing appeared to the public as an official hearing with legislators, including Defendant Townsend, asserting their right as legislators to investigate and review evidence of potential election fraud.

168. Defendant Townsend's actions prior to and on this day demonstrate that Defendant Townsend intended on representing herself as acting under "color of law," exercising her and other legislators' authority to mobilize a crowd of "vigilante style" investigators to seek out and find proof of election fraud.

169. This pursuit of vigilante investigation which Defendant Townsend solicited and encouraged while acting under "color of law," was exactly how Defendant Townsend's associates, Sommet Tolley and Scott Koch (who had been attending rallies all year Defendant led), social engineered their way into Plaintiff's home. Defendants Townsend, Powell and Flynn, then attempted to use, exploit, and manipulate Plaintiff and her family, through terror, intimidation to accomplish their political agenda and financially profit.

170. Prior to and during this November 30, 2020, hearing, Plaintiff still had the heavily armed security team guarding her while the group continued perpetuating stories that Plaintiff and her family were in grave danger. The security team along with their authoritative, and intimidating presence, kept Plaintiff in a constant state of terror for her safety. Plaintiff had not yet provided Defendant Townsend, Powell, or her associates with the affidavit she had refused prior to Maricopa County certification, which was days before the attempted break-in at her home and Wilson's security team was ushered in.

171. When Wilson's team provided security for Plaintiff at the request of Defendant Townsend and Shattuck, ushered in, in front of Florence Police, Wilson represented himself as a government contractor which Plaintiff did confirm online like First Amendment Praetorians. Wilson told Plaintiff he was licensed. Plaintiff learned on July

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<sup>31</sup> It has also been reported publicly that Phil Waldron worked under Defendant General Mike Flynn when he led the Defense Intelligence Agency ("DIA").

19, 2023, authorities have instructed Shawn Wilson repeatedly to “cease and desist,” representing that he is a licensed security contractor.<sup>32</sup>

172. During the quasi-legislative hearing, as part of a pattern and course of conduct in which Defendant Townsend as Chair of the House Elections Committee, acted under color of law holding herself out and representing to others that she had plenary authority to direct, lead, and initiate election fraud and irregularity investigations, which Plaintiff learned much later was for the purpose of exercising her claimed legislative authority to determine the State’s Presidential electors.

173. At that November Giuliani hearing, Defendant Townsend and a panel of other legislators asked Giuliani and Waldron about testimony they had received from those out at the airstrip with the South Korean plane; which included Defendant security throughout 2020, Marco Trickovic, Defendant Ryan Hartwig, Josh Barnett, and Tom Van Flien attorney and staffer from Congressman’s Gosars office, who had all been at the airstrip taking videos, photos, investigating, *even purportedly engaging the FBI and Ken Cuccinelli Director of Homeland Security to seize the plane carrying South Korean Samsung Dignitaries<sup>33</sup> when it arrived in Seattle, all of which occurred before Plaintiff ever learned about the plane the following day from Trump campaign attorney Brandon Paroly.* All of the individuals at the airstrip had been in prior contact with Defendant Powell as well as most if not all legislators on the panel but especially Defendant Townsend before Defendant’s brought the circus to Plaintiff’s doorstep, without Plaintiff ever leaving her home.

174. In the Giuliani hearing, Defendant Townsend and Colonel Waldron discussed what was needed to determine if counterfeit ballots were counted in the election, Defendant Townsend specifically asked about Korean Air and if they were investigating. Waldron responded, “there were several affidavits that were provided to the legal teams, I don’t have those affidavits with me now but there were affidavits and suggestions, *and I think more of those are in process to obtain more affidavits.*” Another legislator asked Giuliani if he had affidavits that counterfeit ballots were shipped into Arizona.

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<sup>32</sup> [https://www.splcenter.org/hatewatch/2023/07/18/extremist-group-illegally-promotes-security-services-across-us?fbclid=IwAR3QJ1-pTkLe8ZGG9U-zELtRIC3i83\\_tls5BwrSokU0dnvq2fL1fkpAE5M](https://www.splcenter.org/hatewatch/2023/07/18/extremist-group-illegally-promotes-security-services-across-us?fbclid=IwAR3QJ1-pTkLe8ZGG9U-zELtRIC3i83_tls5BwrSokU0dnvq2fL1fkpAE5M)

<sup>33</sup> The Samsung execs boss Jay Y Lee was in prison for a political corruption and bribery scandal of the former South Korean President which President Biden pressured the South Korea to pardon to further U.S. economic interests in semiconductor chip manufacturing. Lee’s pardon did occur in August 2022.



175. As stated, *prior to certification*, Plaintiff was pressured by Defendants or their agents representing to be acting on Defendants behalf, to provide an affidavit before certification for the team to secure the FISA warrant, which she refused to do without knowing more about Koch.

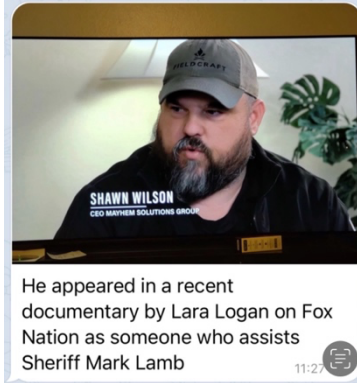
176. As of this November 30, 2020, hearing, Plaintiff had Shawn Wilson's Mayhem Security Solutions, heavily armed and intimidating by their mere presence security team surrounding and gaslighting her, along with Defendant Townsend and her associates, but at this point had still not yet provided the group with an affidavit.

**UNTANGLING THE RELATIONSHIPS AND WEB OF ASSOCIATES  
MOBILIZED AS WEAPONS ENGAGED IN VIOLATION OF  
PLAINTIFF AND HER FAMILY'S INDIVIDUAL RIGHTS**

177. It took Plaintiff many months amidst all of the coercive control, terrorizing, gaslighting, deflecting, and misdirecting, to unwind these relationships and realize that all persons Plaintiff encountered were affiliated with one another and part of an organized group. Sheriff Mark Lamb is according to his own admission, an associate of Shawn Wilson, Koch's boss, who he stated he has lunch with every 3 months or so. Lamb also attended Trump rallies with Defendant Shattuck and his wife, and according to Shattuck they knew each other well. Trickovic and Townsend were also associates of Sheriff Lamb prior to the election.

178. Scott Koch, who worked for Wilson, attended rallies throughout 2020 where both Defendant Townsend and Sheriff Lamb spoke. Wilson was a former Sheriff Lamb deputy. Defendant Flynn was also in direct contact with both Wilson and Townsend throughout this entire time period the group had a "security detail," continually on Plaintiff keeping her and her family in a constant state of fear, terror, and intimidation while using coercive control, to manipulate and manage both Plaintiff and the narrative politically for Defendant Powell's Arizona election contest case, substantial fundraising claiming Plaintiff and her family were in danger and needed protection, while Defendants Powell and Flynn solicited millions in donations. The photo in the lower right corner is Shawn Wilson in 2023, at an America Project event.





179. In a lawsuit Defendant Flynn filed against an unrelated third party, Defendant Flynn alleged, “General Flynn recently began, ‘The America Project,’ a non-partisan, social welfare organization defending rights and freedoms, election integrity, and border security.”

180. For Plaintiff and her family, it seemed like suddenly just after the election, she and her family were swarmed with so many seemingly disconnected people in authority representing themselves as law enforcement or “government,” claiming there was election fraud and they had proof of such.

181. Defendants Townsend, and shortly thereafter Flynn, and Powell, repeatedly told Plaintiff and their agents Plaintiff and her families their lives were in danger. Defendants worked together with each other and their agents, the security teams of both Wilson and First Amendment Praetorians consisting of former FBI, law enforcement, CIA, NSA, etc. men who Defendant’s sent to Plaintiff’s home in the post-election period, ***who were ushered into her home in front of local police, who they were familiar and affiliated with, after she called 911 for an attempted break-in.*** As events unfolded, Plaintiff came to understand the group as led by Defendants Townsend, Powell, and Flynn, not only

1 already knew each other prior to the 2020 election, but had been part of an organized  
2 political movement gathered well before the 2020 election.

3  
4 182. It would have been one thing had Plaintiff stepped up and volunteered to take  
5 part in the effort because she wanted to. This was quite the opposite. Plaintiff did not and  
6 Defendant's knew this at the time. Plaintiff was asked to help a woman and attempted to  
7 do so by asking Defendant Townsend to help the woman get authorities to her facility.  
8 Before Plaintiff knew what was happening, her house was swarmed with Defendant's  
9 associates using fear, terror, exploitation, and manipulation. Defendant Townsend was  
10 knew Plaintiff was a vulnerable adult, yet she wanted to accomplish a political agenda  
11 and that was all that mattered to her. She did not care who she had to use, exploit and  
12 manipulate to accomplish her agenda.

13  
14 183. What Defendant's did to Plaintiff and her family was so outside the bounds of  
15 human decency and American family values, that it truly shocks the conscious. This  
16 behavior was not patriotic. It was abusive and dangerous. Given Plaintiff's condition, it  
17 could have even been fatal.

18  
19 184. Defendant Townsend acted directly literally took Plaintiff and her family as  
20 hostages and held them as prisoners of war to accomplish their political agenda, including  
21 financial interests through fundraising, while Plaintiff and her family have lived their  
22 lives in complete terror based on their actions, and have had to *borrow* over 100K to  
23 survive living away from home because they have not felt safe to return home under the  
24 circumstances, in addition to stress related hospitalizations, and costs of litigating and  
25 filing the election fraud case in State court all the way to SCOTUS at her own expense,<sup>34</sup>  
26 which mirrored Defendant

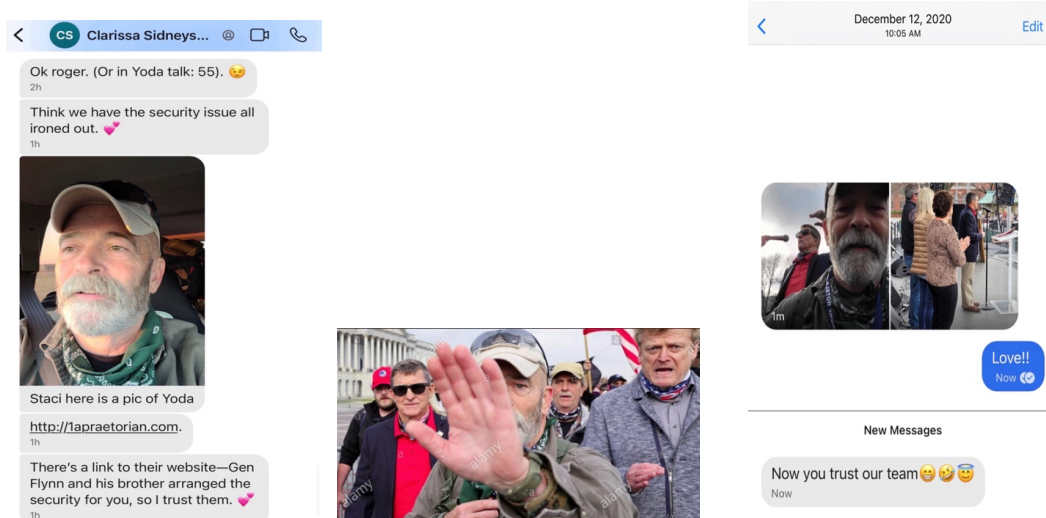
27 185. Because Defendant Townsend was so desperate to find and prove election fraud,  
28 while serving as a government official, claiming as a member of "Oathkeepers," to honor  
and uphold her oath to the Constitution, acted with the same level of tyranny the  
Founders detested, as she acted in direct ways abusing her power while along with co-  
defendants, violated Plaintiff and her family's individual rights in the most shocking and  
egregious ways as they commissioned and sent a paramilitary group to literally held  
Plaintiff and her family hostage, using fear, terror, coercion, false pretenses, and  
intimidation to exploit her and her family for their own gain, and to access another  
witness who they sought.

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<sup>34</sup> Plaintiff funded the entire litigation out of money she borrowed except for mailing and transcripts which were  
donated by a third party. Plaintiff also funded feeding, transport, and necessities for the paramilitary team occupying  
her home at a grocery bill over the extended seven week period which was several thousand dollars.

186. At this point on November 30, 2020, *Plaintiff believes it was she and the Seattle whistleblower's affidavits that Waldron referred to when he said they were "still in the process of obtaining affidavits,"* and still sought as part of their investigation Defendant Townsend requested on the dias in the quasi-legislative hearing.

187. On December 1, 2020, Plaintiff received a message from Defendant Powell's assistant Carissa Keshel stating she spoke with Defendant General Flynn and wanted Plaintiff to get information from the Seattle woman and do a declaration and told Plaintiff Defendant Flynn was sending a security team they were switching out with the Mayhem team and replacing them with guys Defendant Flynn could trust, which they later claimed Wilson was "dirty."



188. At her home with Wilson's security team Peter Hunt reviewed the website Defendant Flynn and Powell's assistant, Carissa Keshel sent Plaintiff. Hunt looked up the group Defendant Flynn was sending and called Wilson frantic telling him in front of Plaintiff that Flynn was sending "cleaners" to kill Plaintiff. Wilson told Hunt that Flynn was not sending cleaners. Hunt argued that they were sending a team led by Geoffrey Flohr, who was a twenty year homicide detective and that's exactly who Flynn would send as a cleaner to kill her. Plaintiff was very shaken up hearing this and insisted she was immediately calling the FBI.

189. Wilson told her and Hunt not to do that reiterating he knew all the law enforcement in the State, that Flynn was not going to send cleaners, and that there was no need to call the FBI. Plaintiff had attempted and not had any results reaching the FBI

1 prior to this,<sup>35</sup> and decided to ask her friend Daryl to come over to be with her as the  
2 group transitioned from Wilson's to the 1AP team, which he did.

3  
4 190. Though 1AP Flohr alleged his team had reliable information that Wilson was  
5 "dirty," Plaintiff learned from Defendant Shattuck that Flohr had spoken to Wilson when  
6 he was on his way to Plaintiff's home after Defendant Flynn contacted him and asked  
7 him to go to Plaintiff's home. Flohr assured Plaintiff's friend Daryl, they had reliable  
8 information that Plaintiff was in danger, and he showed his qualifications and Michigan  
9 State Police ID card as well as other ID showing his credentials assuring him he and his  
10 team would keep Plaintiff safe so Daryl left.

11  
12 191. Flohr knew Plaintiff and her family were intimidated and scared and completely  
13 overwhelmed by both Wilson's and the 1AP team. Flohr repeatedly tried to reassure  
14 Plaintiff they were there to keep her safe despite how very uncomfortable and scared of  
15 the team she repeatedly said she and her family were.

16  
17 192. The 1AP team exercised complete control of Plaintiff and her family when they  
18 were in the home. The group used fear, intimidation, and coercion, to control Plaintiff  
19 and how she responded. She was not allowed to leave without permission and if they did  
20 go to the grocery store, Plaintiff was not allowed to drive and the men stayed within  
21 arm's length and controlled everything she did through fear and intimidation.

22  
23 193. Plaintiff asked Carissa Keshel, Defendant Powell's assistant about what to do if  
24 the FBI called back, Keshel told Plaintiff that Powell did not want her to speak to just any  
25 FBI, that they had certain supervisors and agents they could trust and would have her  
26 lawyer Howard Kleinfelder speak to the FBI and coordinate speaking to them on her  
27 behalf. Keshel told Plaintiff their team had put together a great deal of evidence which  
28 she said validated Koch's statements on the recording which their team had listened to.  
She said they had evidence such as a mole in the Memphis, Tennessee FedEx hub who  
validated the Seattle whistleblower's statements.

194. ***On December 2, 2020, Defendant Powell, who was in direct contact with  
Defendant Townsend, stated on the Pete Santilli show that she had evidence of trucks  
of ballots coming from Mexico as well as planes full of ballots.***

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<sup>35</sup> It should be noted that FBI field offices were closed to walk-ins during this period due to COVID or the Seattle woman could have just gone into a field office.